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6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8 LIBERTY MEDIA HOLDINGS, LLC )  
9 Plaintiff, ) Case No. \_\_\_\_\_  
10 vs. )  
11 )  
12 SERGEJ LETYAGIN, d/b/a )  
13 SUNPORNO.COM, IDEAL CONSULT, )  
14 LTD., "ADVERT", "CASTA", )  
15 "TRIKSTER", "WORKER", "LIKIS", )  
16 "TESTER" and DOES 1-50 )  
17 Defendants )  
18 \_\_\_\_\_ )

19 **FILED UNDER SEAL**

20 **DECLARATION OF CHAD BELVILLE IN  
21 SUPPORT OF PLAINTIFF'S *EX PARTE*  
22 MOTION FOR ALTERNATE SERVICE**

23 I, CHAD BELVILLE, hereby declare under penalty of perjury:

24 1. I am over the age of 18 and am a resident of the state of Iowa.

25 2. I have personal knowledge of the facts herein, and, if called as a witness, could  
26 testify competently thereto.

27 3. I am the counsel for Fraserside IP, LLC, the Plaintiff in *Fraserside v. Letyagin, et al* 11-cv-03041, in the Northern District of Iowa.

28 4. I am familiar with the actions of foreign-based, offshore intellectual property  
pirates. It is within my knowledge and expertise that when intellectual property thieves who  
have taken steps to avoid liability become aware that their actions may result in legal liability,

1 they quickly take steps to evade such liability. Knowing that they lack solid legal defenses, their  
2 primary line of "defense" is to evade service.

3       5. In the course of the litigation in Iowa, I attempted to have Letyagin served at the  
4 address listed in the Whois information in Gibraltar. The process server I retained submitted  
5 requests to the Central Authority of Gibraltar, in compliance with Hague Convention guidelines.  
6 The Registrar of the Supreme Court of Gibraltar advised by the Certificate that the Defendant  
7 was not at the address provided. A true and correct copy of this Certificate is attached as Exhibit  
8 N.

9       6. Since the United States actions against the SunPorno.com website have been  
10 filed, the Defendants have changed the Whois information to show Ideal Consult, Ltd., a  
11 company in the Seychelles. Despite this change in listing, however, the email address contact  
12 point in the Whois registration remains the same as when the website was owned by Letyagin.

13       7. Defendants have provided bogus addresses, likely fictitious entities, and  
14 successfully evaded normal service of process while maintaining an Internet business with global  
15 reach.

16       8. Valentin Gurvits, Evan Fray-Witzer, Jennifer Rinden and Connie Alt are my  
17 opposing counsel in the Iowa matter, and have regularly communicated with their clients – the  
18 same parties in this action.

19       9. In the Iowa action, alternate service via email was granted by the court. This  
20 motion was filed under seal in order to avoid the obvious reaction the Defendants would have if  
21 alerted to the pendency of such a motion: deletion of email accounts in order to further evade  
22 service and frustrate relief.

23       \\  
24       \\

10. It is also my professional opinion that, having performed alternate service in the Iowa matter, that the parties to this suit will receive any documents served upon them via email or if they are served upon the foreign Defendant's attorneys. I believe that the Iowa attorneys will more reliably communicate with their client, as Mr. Gurvits appears to be an attorney who advises his clients to evade service. Alternate service will allow the Defendants to have notice of the claims against them with more certainty than if traditional means were required.

Signed this 31<sup>st</sup> day of May, 2012 in Phoenix, Arizona

Chad Belville